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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re:
 CLUB ONE CASINO, INC.,
 Debtor-in-Possession.

Case No. 15-14017-B-11

Chapter 11

DC No. KDG-5

**EX PARTE APPLICATION FOR ORDER
 SHORTENING TIME FOR SERVICE OF
 NOTICE OF HEARING ON DEBTOR'S
 MOTION PURSUANT TO SECTION 363
 OF THE BANKRUPTCY CODE FOR
 ENTRY OF AN ORDER APPROVING
 THE ENGAGEMENT CONTRACT OF (I)
 MR. BILL HUGHES AS CHIEF
 RESTRUCTURING OFFICER OF THE
 DEBTOR AND (II) GLASSRATNER
 ADVISORY & CAPITAL GROUP, LLC
 TO ASSIST THE CRO**

Date: November 10, 2015

Time: 2:30 p.m.

Place: United States Bankruptcy Court
 2500 Tulare Street, Fifth Floor
 Department B, Courtroom 13
 Fresno, California

Judge: Honorable René Lastreto II

Club One Casino, Inc., the above-captioned debtor and debtor in possession (the
 "Debtor"), brings this *Ex Parte Application for Order Shortening Time for Notice of Hearing*
on Debtor's Motion Pursuant to Section 363 of the Bankruptcy Code for Entry of an Order
Approving the Engagement Contract of (i) Mr. Bill Hughes as Chief Restructuring

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1 *Officer of the Debtor and (ii) GlassRatner Advisory & Capital Group, LLC to Assist the CRO*
2 *("ex parte application").*

3 1. Debtor seeks an Order Shortening Time for the hearing on his *Debtor's Motion*
4 *Pursuant to Section 363 of the Bankruptcy Code for Entry of an Order Approving the*
5 *Engagement Contract of (i) Mr. Bill Hughes as Chief Restructuring Officer of the Debtor and*
6 *(ii) GlassRatner Advisory & Capital Group, LLC to Assist the CRO* ("Motion"). By the
7 Motion, Debtor seeks authorization to approve the Engagement Contract dated October 9,
8 2015, by and between the Debtor and GlassRatner Advisory & Capital Group, LLC
9 ("Engagement Contract").

10 2. Local Rule 9014-1(f)(2) permits a motion to be filed and served on interested
11 parties at least fourteen (14) days prior to the hearing date unless longer notice is required by
12 the rules, so long as opposition is permitted to be presented at the hearing on the motion. Fed.
13 R. Bankr. Proc. Rule 2002(a)(2) requires 21-days' notice of a motion concerning the proposed
14 use, sale, or lease of property of the estate other than in the ordinary course of business, so the
15 Motion ordinarily requires 21-days' notice. Fed. R. Bankr. Proc. 9006(c) allows the court in its
16 discretion to reduce the notice period upon cause shown.

17 3. Since the commencement of its case Debtor has prepared, filed, and served
18 three first day motions, had hearings on the first day motions, prepared orders on first day
19 motions, prepared and filed notices of continued hearings, and working diligently on its
20 schedules and statement of financial affairs. During this time, Debtor has been continuing to
21 operate its business, all while working with counsel on all of the necessary administrative
22 requirements of its case. As such, today was the first day Debtor was able to complete the
23 Motion and its supporting documents.

24 4. Based on the declaration of Kyle R. Kirkland, president of Debtor, it is in the
25 best interest of the estate to obtain Court approval of the Engagement Contract without delay.
26 Mr. Kirkland believes that holding the hearing on November 10 is greatly preferred to waiting
27 until December 2. Mr. Kirkland believes that Mr. Hughes must commence the services subject
28 to the Employment Contract without delay.

By /s/ Hagop T. Bedoyan
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